



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

| | |
|-----------------------------|--|
| Applicant Name: | OCPP/Pro-Cert Canada, Inc. |
| Est. Number: | N/A |
| Physical Address: | 475 Valley Road, Saskatoon, Saskatchewan Canada, S7K3J6 |
| Mailing Address: | Box 100A, RR #3 Saskatoon, Saskatchewan Canada |
| Contact & Title: | J. Wallace Hamm, President |
| E-mail Address: | procertorganic@yahoo.com |
| Phone Number: | 306-382-1299 |
| Auditor(s): | Darrell Wilson, Lead Auditor; Patty Heckart, Auditor; & Dave Hildreth, Auditor |
| Program: | USDA National Organic Program (NOP) |
| Audit Date(s): | January 29 – October 25, 2007 |
| Audit Identifier: | NP7029OOC |
| Action Required: | Yes |
| Audit Type: | Surveillance – Accreditation Renewal Audit |
| Audit Objective: | To verify continuing compliance to the audit criteria; and to verify the implementation and effectiveness of corrective actions in addressing the previous non-compliances |
| Audit Criteria: | 7 CFR Part 205.510, National Organic Program; Final Rule, dated December 21, 2000, updated September 11, 2006 |
| Audit Scope: | OCPP's Quality Manual dated January 2007, including personnel, processes, procedures, facilities, and related records. |
| Location(s) Audited: | OCPP Office in Saskatoon, SK, CA; SasCoPak, Saskatoon, SK, CA; Doug Horner & Rusty Cameron, The Pas, Manitoba, CA; and Keith & Jeannine Kirby, Gorton, NY. |

OCPP/Pro-Cert Canada, Inc. (OCPP) is a for-profit organization. The OCPP Organic Certification Program was accredited as a certifying agent on May 24, 2002, to the National Organic Program (NOP) for crops, livestock, wild crop, and handling operations. OCPP currently has 1,520 clients with 1,171 crop and livestock, 160 wild crop, and 189 handling operations. Clients are certified in Canada and the United States (MA, ME, NY, OR, & PA).

The 5 Year Accreditation Audit process started on January 29, 2007 with a review of the documents submitted by OCPP and concluded with the on-site surveillance audit, which was conducted on October 21 - 25, 2007.



Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

Initial applications are reviewed for completeness and compliance by an evaluator. Once the evaluator determines that the file is complete and ready for an onsite inspection, an inspector is assigned. The inspector has 72 hours to contact the client and arrange the onsite inspection. After the inspection is complete, the inspection report and all other documentation pertaining to the application are presented to another evaluator or several evaluators, depending on the complexity of the operation, and is reviewed for compliance and the final decision is made.

The audit included observations of two renewal inspections and one demonstration inspection by OCPP. The operations for the renewal inspection consisted of a co-packer of various oils and flax seed meal, and a dairy and crop operation, and the demonstration inspection was a wild rice operation.

A comparison of fees assessed to the fee schedule verified that the fees being charged are the same as charges shown on the fee schedule.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that OCPP is currently operating in compliance to the requirements of the audit criteria except as noted in the non-compliances. The corrective actions for the non-compliances from the 2003 annual update were reviewed for implementation and effectiveness and the non-compliances were cleared. Five non-compliances were identified during the audit.

NP3157MA.NC1 - Minor – Cleared
NP3157MA.NC2 – Minor – Cleared
NP3157MA.NC3 - Major – Cleared
NP3157MA.NC4 - Minor – Cleared

NP7029OOC.NC1 - NOP §205.404(b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation.” *During the review of client files, 3 files were found to contain certified categories fallow and plough down. These two items are not consistent with the NOP regulation.*

NP7029OOC.NC2 - NOP §205.501(a) states, “A private or governmental entity accredited as a certifying agent under this subpart must:

- (1) Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part.” *A review of the resumes for personnel involved with the certification operation indicated that the majority of the resumes do not have enough detailed information to determine whether or not the individual has the necessary qualifications.*
- (6) Conduct annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services.” *There are no performance evaluations for the personnel from the Eastern affiliate.*



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

- (11)(v) Prevent conflicts of interest by: Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest of interest disclosure report.” *A review of conflict of interest disclosure reports indicated that only one third of the Eastern affiliate have current conflict of interest disclosure reports.*
- (15)(ii) Submit to the Administrator a copy of: A list, on January 2 of each year, including the name, address, and telephone number of each operation granted certification during the preceding year.” *OCPP documentation used for NOP organic certification does not contain a policy or procedure addressing this clause.*

NP7029OOC.NC3 - NOP §205.510(a) states, “An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees...” *OCPP documentation used for NOP organic certification does not contain a policy or procedure addressing this clause.*

NP7029OOC.NC4 - NOP §205.510(b) states, “Certifying agents must maintain records according to the following schedule: (2) Records created by the certifying agent regarding applicants for certification and certified operations must be maintained for not less than 10 years beyond their creation; and (3) Records created or received by the certifying agent pursuant to the accreditation requirements of this subpart F, excluding any records covered by §§205.510(b)(2), must be maintained for not less than 5 years beyond their creation or receipt.” *OCPP documentation for NOP organic certification does not address these two clauses.*

NP7029OOC.NC5 – OCPP Quality Manual, Section 2.8 requires that all staff and sub-contractors execute the Standard OC/PRO Confidentiality and Conflict of Interest Agreement (Doc. # 2.4.7). *A review of the Confidentiality and Conflict of Interest Agreements indicated that only one third of the Eastern Affiliate has current agreements.*